

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

AUG 10 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Implementation of Section 17 of )  
the Cable Television Consumer )  
Protection and Competition )  
Act of 1992 )

ET Docket No. 93-7

Compatibility Between Cable )  
Systems and Consumer Electronics )  
Equipment )

COMMENTS OF PRODIGY SERVICES COMPANY

Prodigy Services Company hereby submits its comments on the Supplemental Comments of the Cable-Consumer Electronics Compatibility Advisory Group, which "identify a set of measures that can be implemented . . . to help address issues of compatibility between cable systems and consumer electronics equipment."<sup>1</sup> Prodigy wishes to ensure that action on the Advisory Group's recommendations facilitates rather than inhibits the development and deployment of intelligent consumer electronics that will permit the delivery of interactive information services via cable systems.

Prodigy is a pioneer in the online services industry and is the provider of the PRODIGY® service. The PRODIGY service is available virtually nationwide and is used by approximately two million "members". Although predicated on a sophisticated, distributed delivery system, the PRODIGY service currently is delivered solely over local telephone

<sup>1</sup> Filed July 21, 1993 ("Compatibility Comments").  
See FCC Public Notice, DA 93-954 (July 26, 1993).

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lines because they are the only ubiquitous, two-way electronic delivery medium available at this time.

Prodigy hopes in the future to be able to distribute its services over cable television facilities to both personal computers and television sets. The cable industry is moving forward rapidly to increase the deployment of two-way transmission capabilities. As a result, cable systems will in all likelihood soon provide not only a competitive alternative to the use of telephone lines, but also a solution to the problems of phone line contention and slow delivery speeds that currently affect the PRODIGY service.

Consistent with these developments, Prodigy believes that the television set will in the future become the home reception device for a host of multi-media information service applications. The key to realization of this vision will be the introduction of electronics that can provide the interactivity and selectivity necessary to access the variety of service offerings that will be available. It is, therefore, critical that the regulations and requirements adopted in this proceeding permit the creation and distribution of the "intelligent" devices -- whether set top boxes, attachable or integrated interfaces, or television sets and monitors themselves -- that will make these capabilities available to the consumer.

Prodigy is consequently pleased that the Advisory Group recognizes that its proposed standards should be prescribed in a manner that will "not limit[] innovation and experimentation with these rapidly evolving technologies and services."<sup>2</sup> Thus, the Commission should avoid standardization that "freezes" technology or frustrates the possibility of upgrading the relevant electronics. It should, however, encourage the standardization of interfaces to permit greater innovation and competition in equipment design and marketing.

In sum, Prodigy submits that public policy should encourage the proliferation of capabilities for intelligent interaction with cable-provided multi-media offerings as well as cable carriage of such new and diverse services. Through such policies, the FCC can promote the delivery of the benefits of the Information Age to the public generally.

Respectfully submitted,

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August 10, 1993

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<sup>2</sup> Compatibility Comments at 11.

CERTIFICATE OF SERVICE

I, Nancy A. Betters, hereby certify that on this 10th day of August, 1993, I caused copies of the foregoing "Comments of Prodigy Services Company" to be mailed via first-class postage prepaid mail to the following:

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